

of attempt to have them testify as to various alleged, and unsubstantiated, prior “bad acts” on the part of the defendant. Such testimony would not be helpful to the finder of fact and should be excluded by the Court.

Accordingly, the Court should exclude admission into evidence the testimony of Melissa Christie, Timothy Manning, Joseph Bryson, Alexander Chirkov, Gerald Feigen, Stanton Kessler and Mildred Anglin.

Respectfully Submitted,
JOHN CRONIN,

By his Attorneys,

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March 12, 2006

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on March 12, 2006.

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